

WILMER CUTLER PICKERING
HALE AND DORR LLP

SONAL N. MEHTA (SBN 222086)
Sonal.Mehta@wilmerhale.com
2600 El Camino Real, Suite 400
Palo Alto, California 94306
Telephone: (650) 858-6000

DAVID Z. GRINGER (*pro hac vice*)
David.Gringer@wilmerhale.com
ROSS E. FIRSENBAUM (*pro hac vice*)
Ross.Firsenbaum@wilmerhale.com
RYAN CHABOT (*pro hac vice*)
Ryan.Chabot@wilmerhale.com

PAUL VANDERSLICE (*pro hac vice*)
Paul.Vanderslice@wilmerhale.com
7 World Trade Center
250 Greenwich Street
New York, New York 10007
Telephone: (212) 230-8800

Attorneys for Defendant Meta Platforms, Inc.

ARI HOLTZBLATT (*pro hac vice*)
Ari.Holtzblatt@wilmerhale.com
MOLLY M. JENNINGS (*pro hac vice*)
Molly.Jennings@wilmerhale.com
2100 Pennsylvania Ave NW
Washington, DC 20037
Telephone: (202) 663-6000

MICHAELA P. SEWALL (*pro hac vice*)
Michaela.Sewall@wilmerhale.com
60 State Street
Boston, Massachusetts 02109
Telephone: (617) 526-6000

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware
Corporation,

Defendant.

Case No. 3:20-cv-08570-JD

**DECLARATION OF DAVID Z. GRINGER
IN SUPPORT OF DEFENDANT META
PLATFORMS, INC.'S MOTION TO
EXCLUDE EXPERT TESTIMONY AND
OPINIONS OF SARAH LAMDAN**

Judge: Hon. James Donato

1 I, DAVID Z. GRINGER, declare as follows:

2 1. I am a partner at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I
3 represent Defendant Meta Platforms, Inc. in the above-captioned action. I submit this
4 declaration in support of Meta's Motion to Exclude Expert Testimony and Opinions of Sarah
5 Lamdan.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Merits
7 Report of Sarah Lamdan, dated January 12, 2024.

8 3. Attached hereto as Exhibit 2 is a true and correct copy of the Expert Merits
9 Rebuttal Report of Sarah Lamdan, dated February 9, 2024.

10 4. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the transcript
11 from Sarah Lamdan's merits deposition held on March 21, 2024.

12 5. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the transcript
13 from Sarah Lamdan's class certification deposition held on September 29, 2023.

14 I declare that the foregoing is true and correct under penalty of perjury.

15 Executed on this 5th day of April, 2024, in New York, New York.

16 By: /s/ David Z. Gringer
17 David Z. Gringer
18
19
20
21
22
23
24
25
26
27
28

SIGNATURE ATTESTATION

This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

By: /s/ Sonal N. Mehta
Sonal N. Mehta